

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 05-292 (JJF)

PLAINTIFF'S PROPOSED VERDICT FORM

July 19, 2006

QUESTION NO. 1:

- A. Do you find by a preponderance of the evidence that Chunghwa Picture Tubes, Ltd's ("CPT") LCD products containing both an outer guard ring and an inner guard ring literally infringe either of the following claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 8		

- B. Do you find by a preponderance of the evidence that CPT's LCD products containing both an outer guard ring and an inner guard ring infringe, under the doctrine of equivalents, either of the following claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 8		

QUESTION NO. 2:

- A. Do you find by a preponderance of the evidence that CPT's products containing only an outer guard ring literally infringe claim 1 of the '002 patent?

Answer "Yes" or "No" for the claim listed below.

CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		

- B. Do you find by a preponderance of the evidence that CPT's products containing only an outer guard ring infringe, under the doctrine of equivalents, claim 1 of the '002 patent?

Answer "Yes" or "No" for the claim listed below.

CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		

IF YOU HAVE ANSWERED “YES” TO ANY CLAIM LISTED IN QUESTION NOS. 1 AND 2, THEN ANSWER QUESTION NOS. 3 THROUGH 6. OTHERWISE, PROCEED TO QUESTION NOS. 8 AND 9, AND DO NOT ANSWER QUESTION NO. 10. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 3:

- A. Do you find by a preponderance of the evidence that CPT has used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer “Yes” or “No” below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that CPT has actively induced anyone to use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer “Yes” or “No” below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 4:

- A. Do you find by a preponderance of the evidence that Tatung Company has used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that Tatung Company has actively induced anyone to use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 5:

- A. Do you find by a preponderance of the evidence that Tatung Company of America has used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that Tatung Company of America has actively induced anyone to use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 6:

- A. Do you find by a preponderance of the evidence that ViewSonic Corporation has used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that ViewSonic Corporation has actively induced anyone to use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD product or any completed LCD display (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD product?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

IF YOU HAVE ANSWERED “YES” TO ANY OF QUESTION NOS. 3 THROUGH 6, THEN ANSWER QUESTION NOS. 7 THROUGH 9. OTHERWISE, PROCEED TO QUESTION NOS. 8 AND 9, AND DO NOT ANSWER QUESTION NO. 7 OR QUESTION NO. 10. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 7:

Do you find by clear and convincing evidence that any defendant’s infringement of the claims of the ‘002 Patent was willful? Answer “Yes” or “No” for each Defendant below.

	YES (Willful Infringement)	NO (Not Willful Infringement)
Chunghwa Picture Tubes		
Tatung Company		
Tatung Company of America		
ViewSonic Corporation		

QUESTION NO. 8:

Have Defendants proven by clear and convincing evidence that claim 1 of the '002 Patent is invalid by anticipation?

Answer "Yes" or "No" below.

CLAIM	YES (Invalid)	NO (Not Invalid)
Claim 1		

If your answer listed in Question No. 8 is "Yes," specifically identify the single prior reference that anticipates that claim:

QUESTION NO. 9:

Have Defendants proven by clear and convincing evidence that claim 8 of the '002 Patent is invalid for obviousness?

Answer "Yes" or "No" below.

CLAIM	YES (Invalid)	NO (Not Invalid)
Claim 8		

If your answer to Question No. 9 is "Yes," specifically identify the combination or combinations of references that you find makes the claim obvious:

IF YOU HAVE FOUND INFRINGEMENT OF A VALID CLAIM, PLEASE ANSWER QUESTION 10. IF YOU HAVE NOT FOUND INFRINGEMENT OR YOU HAVE FOUND INFRINGEMENT ONLY OF A CLAIM YOU HAVE FOUND TO BE INVALID, DO NOT ANSWER QUESTION NO. 10. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 10:

What sum of money, if paid now in cash, would fairly and adequately compensate the plaintiff for infringement?

Answer: _____

Signed this ____ day of July, 2006.

Jury Foreperson